

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**  
 In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

March 3, 2022

The Honorable Sarah Netburn  
 Thurgood Marshall United States Courthouse  
 40 Foley Square, Room 430  
 New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

Counsel for the Consolidated Amended Complaint (“CAC”) Plaintiffs and the *Ashton* Plaintiffs jointly write to respectfully request Your Honor’s approval of a modest reallocation of the page lengths authorized by the Court for the reply briefs in support of the CAC and *Ashton* Plaintiffs’ motions to revise this Court’s March 28, 2018 Order pursuant to Fed. R. Civ. P. 54(b). *See* ECF Nos. 7431-7432 (CAC Plaintiffs); 7481-7483 (*Ashton* Plaintiffs).

As the Court is aware, the separate reply briefs of the CAC Plaintiffs and the *Ashton* Plaintiffs in support of their Rule 54(b) motions are presently due on March 9, 2022. *See* Order at ECF No. 7504. As set forth in Section III(B) of Your Honor’s Individual Practices In Civil Cases, each reply brief is limited to 10 pages, or 20 pages in total for the two briefs. The CAC Plaintiffs and *Ashton* Plaintiffs have conferred on how to offer the clearest presentation of the issues and arguments, and jointly request that the Court approve a reallocation of the total pages to permit the CAC Plaintiffs to submit a brief not to exceed fifteen (15) pages, and the *Ashton* Plaintiffs to submit a reply brief not to exceed five (5) pages. We believe this modification will ensure the clearest and most orderly presentation of the issues to the Court, and will not change the total number of pages for the reply briefs.

Plaintiffs have communicated with counsel for the Kingdom of Saudi Arabia concerning this issue and the Kingdom has indicated that it will not oppose Plaintiffs’ request.

Honorable Sarah Netburn  
March 3, 2022  
Page 2

---

The CAC Plaintiffs and *Ashton* Plaintiffs thank the Court for its consideration of this request.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter  
SEAN P. CARTER  
COZEN O'CONNOR  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
Tel.: (215) 665-2105  
Email: [scarter1@cozen.com](mailto:scarter1@cozen.com)

*On behalf of the CAC Plaintiffs*

KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian  
Steven R. Pounian  
Kreindler & Kreindler LLP  
750 Third Avenue  
New York, NY 10017  
Tel: (212) 687-8181  
E-mail: [spounian@kreindler.com](mailto:spounian@kreindler.com)

*On behalf of the Ashton Plaintiffs*

cc: All MDL Counsel of Record (via ECF)

LEGAL\56685900\1